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10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

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VERONICA THERESA RAMIREZ,)
)
Plaintiff,) CASE NO.
) 2:23-cv-01885-GMN-EJY
v.)
) UNOPPOSED MOTION
) FOR EXTENSION OF TIME TO FILE
MARTIN O'MALLEY,) PLAINTIFF'S BRIEF
COMMISSIONER OF SOCIAL SECURITY,)
)
Defendant.)
)

16 Plaintiff, Veronica Theresa Ramirez, by her attorney, moves for a forty-six (46) day
17 extension of time to file Plaintiff's opening brief by April 1, 2024. Plaintiff's opening brief is
18 currently due to be filed February 15, 2024.

20 Counsel requests this extension due to multiple, simultaneous filing deadlines. Counsel
21 requires additional time to properly and thoroughly prepare Plaintiff's brief. For instance,
22 between February 5, and March 29, 2024, staff in Counsel's office have one hundred and twenty-
23 three (123) Plaintiff briefs due. This figure does not include briefings which will be due after the
24 filing of Administrative Records throughout this timeframe, Oral Arguments, appeals to Circuit
25 Courts, Reply Briefs, settlement negotiations, and the various other tasks which arise throughout
26 the course of litigation. These circumstances do not allow for Plaintiff's Counsel to properly
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prepare the brief by the current deadline. This request will not cause Defendant any undue hardship. This extension is needed to thoroughly and properly prepare the brief.

Wherefore, Plaintiff requests an extension from February 15, 2024, up to and including April 1, 2024, to file her brief. Counsel for the Plaintiff has conferred with Defendant's Counsel who kindly has no objection to this request.

Dated February 5, 2024.

Respectfully submitted,

/s/Hal Taylor
Hal Taylor, Esq.

ORDER

IT IS SO ORDERED.

IT IS FURTHER ORDERED that Plaintiff's Opening Brief is due April 1, 2024.

Dated this 5th day of February, 2024.

Elayna J. Zouchal
U.S. MAGISTRATE JUDGE